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June 6, 1994

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JUN 6 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Establishing an Advisory Committee to Negotiate Regulations
for the Shared Use of the 27.5 - 29.5 GHz Band
CC Docket No. 92-297

Dear Mr. Caton:

Teledesic Corporation ("Teledesic"), by its attorneys, hereby responds to the memorandum of the Federal Communications Commission ("FCC" or the "Commission") dated May 26, 1994, regarding the above-referenced matter. Specifically, the memorandum requests applicants for membership on the above-referenced Advisory Committee to consider the formation of groups of similar technical interests so that fewer representatives will sit on the full Advisory Committee.

Teledesic respectfully requests that its representatives be permitted to participate in the full Advisory Committee meetings, which will concern the formulation of technical rules for the Local Multipoint Distribution Service and/or the fixed satellite service in order to maximize sharing of the 28 GHz band among these services. As demonstrated more fully below, the interests of Teledesic are unique and divergent from the interests of other applicants for Advisory Committee membership. Thus, Teledesic cannot successfully consolidate its technical interests with those of other interested parties.

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Teledesic submitted its application for membership on the Advisory Committee to the Commission on March 21, 1994. See Comments and Application for Membership of Teledesic Corporation, CC Docket No. 92-297 (March 21, 1994). Also on March 21st, Teledesic filed an application with the FCC for authority to construct, launch and operate a low-Earth orbit ("LEO") satellite system that would utilize spectrum in the 28 GHz band, which is central to the agenda of the Advisory Committee. See Application of Teledesic Corporation, FCC File No. 22-DSS-P/LA-94 (March 21, 1994).

Teledesic's interests in the 28 GHz band are unique for the following reasons: First, Teledesic's proposed system is the only LEO system providing fixed satellite service in the 28 GHz band. Teledesic has unique concerns regarding how other proposed uses of the 28 GHz spectrum will interfere with its satellite service. Teledesic's LEO satellite constellation and other aspects of the network configuration are unique from any other existing or proposed satellite network. The Teledesic Network comprises a constellation of 840 satellites plus on-orbit active spaces to enable the delivery of broadband services on a global basis. Unlike LEO systems designed to provide voice grade service, Teledesic's ability to provide high quality, high speed wireless channels at the intended peak user density levels requires access to the requested spectrum. Thus, Teledesic's interests are unique among the Advisory Committee applicants.

Second, Teledesic is the only LEO satellite system in the 28 GHz band planning to utilize the spectrum for its terminal uplinks and downlinks. Other LEO interests that have applied for Advisory Committee membership, such as Motorola Satellite Communications, Inc., propose to utilize the 28 GHz band for feeder links for their satellite systems in the mobile satellite service. Some of these LEO interests, such as Ellipsat Corporation, even have expressed a preference to locate their feeder links outside of the 28 GHz band.

Third, Teledesic's proposed system is the only provider of fixed satellite service in the 28 GHz band that is international in scope. Unlike the proposed or authorized domestic geostationary satellite systems of Hughes Space and Communications Company and Norris Satellite Communications, Inc., Teledesic's LEO constellation will provide international service throughout the world. Teledesic thus is uniquely concerned with the global ramifications of any service rules or spectrum allocations formulated by the Advisory Committee.

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For the foregoing reasons, Teledesic respectfully submits that its interests are sufficiently distinct from those of other applicants for membership on the Advisory Committee that it is unable to consolidate its membership request with any other party. Teledesic alone proposes to operate an international LEO satellite system in the fixed satellite service in the 28 GHz band. Teledesic therefore requests that its representatives be permitted to participate in the full Advisory Committee meetings.

Please direct any questions regarding this matter to the undersigned.

Very truly yours,



Tom W. Davidson, P.C.

cc: Susan Magnotti, Esq.